REMARKS/ARGUMENTS

The Office Action mailed November 16, 2007 has been received and the Examiner's comments carefully reviewed. Claims 1-19 are rejected. Claims 1, 9 and 16 have been amended. For at least the following reasons, Applicants respectfully submit that the pending claims are in condition for allowance.

Claim Objections

Claim 1 was objected to because it is unclear how the non-structure feature 'spans' other tags. The claim was also objected to because the claim recited the following phrase "placing a start feature tag at the start tag location." The claims have been amended to address the objection and the applicants respectfully request the objection be withdrawn.

Claim Rejections

Claims 1-19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ayers ("AbiWord's Potential"), hereafter referred to as "Ayers", in view of AbiWord Schema (www.abisource.com/awml.xsd). hereafter referred to as "AbiWord Schema". The Applicants respectfully disagree but have amended the claims to more clearly define the invention.

As amended, Claim 1 recites in part "determining an end feature tag location for the non-structured feature; wherein the non-structure feature spans a range beginning at a location associated with the start feature tag location and ends at a location associated with the end feature tag location; wherein the range encompasses other tags in the ML document; placing a start feature tag at the start feature tag location; wherein the start feature tag is an empty tag that

does not include other elements; and placing an end feature tag at the end feature tag location, wherein the end feature tag is an empty tag that does not include other elements; and wherein the start feature tag and the end feature tag are separated by the range while maintaining a well formed ML document." In contrast, Ayers does not teach marking the beginning of a non-structure feature with a first empty tag, and the end of the non-structure feature with a second empty tag. Further, Ayers does not teach that the two tags are separated by a range that spans other tags.

The Office Actions states "A word processor product that reads a word-processor document stored as a * .abw file which is written in XML. Ayers also discloses performing an action on the word processor document, in the form of creating and examining an AbiWord file that recreates the word processor's set of features. Ayers describes non structured features and discusses a variety of non-structured word processing features. See Ayers, page 3. Both a start tag and end tag are disclosed within the conversion of the word processor document taught by Ayers (compare to "determining a start feature tag location, determining an end feature tag location wherein the feature spans the other tags in the ML document"). As presently claimed, it is unclear to the Examiner how the non-structure feature 'spans' other tags. The Examiner believes the use of the phrase' spans the other tags' fails to accurately describe the related bookmark example found within the specification. The Examiner is interpreting 'spans the other tags' using the AbiWord document found on page 3 of 4 which describes the tags created for the word processing document and performing an action on the word-processor document in the form of creating and examining an AbiWord file that recreates the word processor's set of features. AbiWord schema discloses the location of the published XML Schema at

www.w3.orgI2000/l0/XMLSchema and the XSD for AbiWord, published at

www.abisource.com/awml/xsd (See AbiWord Schema, page 1, line 3, and trailer line, bottom of

page. The claim language included within the independent claim recites the phrase 'may span

other tags while maintaining a well formed ML document'. (compare to "placing a start tag at the

start tag location and an end tag at the end tag location, wherein the start tag and the end tag may

span other tags while maintaining a well formed ML document"). It would have been obvious to

one of ordinary skill in the art, having the teachings of Ayers and AbiWord Schema before him

at the time the invention was made, to modify the AbiWord documents taught by Ayers to

include the AbiWord XSD of AbiWord Schema because it would have given the author a

proficient means of validating the AbiWord document and defining tags within a document."

(Office Action, pages 3-4).

Ayers teaches storing a word processor document in XML format. Ayers teaches that

portions of the document may be formatted. Ayers, however, does not teach a non-structured

feature that is *defined through the use of two empty tags*. For example, Ayers does not teach the

use of a first empty tag to mark the beginning of a non-structured feature. Ayers does not teach

the use of a second empty tag to mark the end of the non-structured feature. Further, Ayers does

not teach that *the first empty tag and the second empty tag are separated by a range that spans*

multiple other tags.

That is, Ayers does not teach two empty tags separated by a range that spans multiple

tags. For example, Ayers does not teach that a first empty tag located within a first other tag, but

outside of a second other tag. Ayers does not teach a second empty tag located outside the first

other tag, but within a second other tag. Ayers does not teach that *those empty tags would be separated by a range* that spans both the first other tag and the second other tag.

Further, Ayers does not teach that two empty tags separated by a region that spans multiple other tags would maintain a well formed ML document. In fact, Ayers teaches storing a word processor document in standard XML. According to this teaching, defining a non-structured feature using two tags separated by a range that spans multiple cells would cause an error.

Since Ayers does not teach determining an end feature tag location for the non-structured feature; wherein the non-structure feature spans a range beginning at a location associated with the start feature tag location and ends at a location associated with the end feature tag location; wherein the range encompasses other tags in the ML document; placing a start feature tag at the start feature tag location; wherein the start feature tag is an empty tag that does not include other elements; and placing an end feature tag at the end feature tag location, wherein the end feature tag is an empty tag that does not include other elements; and wherein the start feature tag and the end feature tag are separated by the range while maintaining a well formed ML document. Claims 2-8 are proposed to be allowable as they depend from a valid base claim.

As amended, Claim 9 recites in part "determining locations for a start feature tag and an end feature tag; wherein a non-structure feature spans a range beginning at a location associated with the start feature tag location and ends at a location associated with the end feature tag location; wherein the start feature tag location is within a first other tag and outside a second tag while the end feature tag is located within a second tag and outside the first tag while adhering to

a well formed ML rule; and placing the start feature tag and the end feature tag at the determined locations, wherein the start feature tag and the end feature tag are empty tags.." For at least the reasons presented above, Claim 9 is proposed to be allowable. Claims 10-15 are proposed to be allowable as they depend from a valid base claim.

As amended, Claim 16 recites in part "determining locations for a start feature tag and an end feature tag; wherein a non-structure feature spans a range beginning at a location associated with the start feature tag location and ends at a location associated with the end feature tag location; wherein the range encompasses multiple other tags in the ML document; and placing a start feature tag and an end feature tag at the determined locations, wherein the start feature tag and the end feature tag are empty tags; wherein the location of the start feature tag indicates a starting position for a non-structured feature and the location of the end feature tag represents an ending position for the non-structured feature; and wherein the start feature tag and the end feature tag are not located within the same ML tag while adhering to a well formed ML rule; and wherein the non-structured feature spans the other tags within the ML document." For at least the reasons presented above, Claim 16 is proposed to be allowable. Claims 17-19 are proposed to be allowable as they depend from a valid base claim.
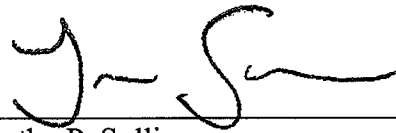
Conclusion

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application,

the Examiner is requested to contact the undersigned attorney for the applicants at the telephone

number provided below.

Respectfully submitted,

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